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FILED
TOM L. HELLON
CLERK OF SUPERIOR COURT

13 AUG 21 PM 3:18

AUG 21 2013

D. WANDELL, DEPUTY

MICHAEL H. JEANES, CLERK
BY *Eltrada*
FILED

13 AUG 19 PM 3:38

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

STATE OF ARIZONA,

Plaintiff,

v.

GABRIEL CHRISTOPHER MORRIS
(001),

Defendant.

Case No:

73 SGJ 95

CR20133497-001

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES, a class 2 felony, in violation of A.R.S. § 13-2310;

COUNT 2: THEFT, a class 2 felony, in violation of A.R.S. § 13-1802;

COUNTS 3 through 8: FORGERY, class 4 felonies, in violation of A.R.S. § 13-2002;

COUNTS 9 and 10: AGGRAVATED IDENTITY THEFT, class 4 felonies, in violation of A.R.S. § 13-2009;

COUNT 11: INSURANCE FRAUD, a class 6 felony, in violation of A.R.S. § 20-463;

COUNT 12: THEFT, a class 2 felony, in violation of A.R.S. § 13-1802.

The Arizona State Grand Jury accuses **GABRIEL CHRISTOPHER MORRIS (001)** charging on this 19th day of August, 2013 that in or from PIMA County, Arizona:

COUNT 1

FRAUDULENT SCHEMES AND ARTIFICES

Between May 23, 2013 and August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS (001)** pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from Jim Click Ford, Patelco Credit Union, and/or GEICO by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§13-2310, 13-2301, 13-701, 13-702 and 13-801.

Said conduct occurred when **GABRIEL CHRISTOPHER MORRIS** used a false identity to obtain a 2008 Dodge Durango VIN#1D8HB58258F143259 from Jim Click Ford, financed the 2008 Dodge Durango through Patelco Credit Union, obtained insurance from GEICO on the 2008 Dodge Durango, and filed insurance claims with GEICO.

COUNT 2

THEFT

On or about May 23, 2013 Defendant **GABRIEL CHRISTOPHER MORRIS (001)** without lawful authority, knowingly obtained the services or property of Jim Click Ford and/or Patelco Credit Union with a value of twenty-five thousand dollars (\$25,000) or more, by means of any material misrepresentation with intent to deprive Jim Click Ford and/or Patelco Credit Union of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-701, 13-702, and 13-801.

Said conduct occurred when **GABRIEL CHRISTOPHER MORRIS** used a false identity to purchase a 2008 Dodge Durango VIN#1D8HB58258F143259 from Jim Click Ford and financed said vehicle through Patelco Credit Union.

COUNT 3

FORGERY

On or about May 23, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001) with intent to defraud Jim Click Ford, offered or presented to Jim Click Ford, a Vehicle Buyers Order, a forged instrument or one that contained false information, in violation of A.R.S. §§ 13-2002(A)(3), 13-2001, 13-701, 13-702, and 13-801.

COUNT 4

FORGERY

On or about August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001) with intent to defraud knowingly possessed, an Arizona Department of Transportation Certificate of Title #L2SZ960170072, a forged instrument, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, and 13-801.

COUNT 5

FORGERY

On or about August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001) with intent to defraud knowingly possessed, check #2113117111 written on the account of Tucson Electric in the amount of \$498.12, a forged instrument, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, and 13-801.

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COUNT 6
FORGERY

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On or about August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001) with intent to defraud knowingly possessed, check #213016411 written on the account of Tucson Electric in the amount of \$472.23, a forged instrument, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, and 13-801.

COUNT 7
FORGERY

On or about August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001) with intent to defraud knowingly possessed, check #15793190 written on the account of Direct TV in the amount of \$392.15, a forged instrument, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, and 13-801.

COUNT 8
FORGERY

On or about August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001) with intent to defraud knowingly possessed, check #14851012 written on the account of Direct TV in the amount of \$1,795.60, a forged instrument, in violation of A.R.S. §§ 13-2002(A)(2), 13-2001, 13-701, 13-702, and 13-801.

COUNT 9
AGGRAVATED TAKING THE IDENTITY OF ANOTHER

On or about August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS** (001), knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of Nicole Ann Lehman, Kimberley Anne Gandara, and

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Cleve Herold White without their consent, with the intent to obtain or use their identities for any unlawful purpose or to cause loss to them whether or not they actually suffered any economic loss in violation of A.R.S. §§ 13-2009(A)(1), 13-2009 (B), 13-2001, 13-701, 13-702, and 13-801.

COUNT 10

AGGRAVATED TAKING THE IDENTITY OF ANOTHER

Between May 23, 2013 and August 7, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS (001)**, knowingly took, purchased, manufactured, recorded, possessed or used any personal identifying information of Abraham Fijal without his consent, with the intent to obtain or use Abraham Fijal's identity for any unlawful purpose and caused another person or entity, Jim Click Ford and/or Patelco Credit Union, to suffer an economic loss of \$3,000 or more in violation of A.R.S. §§ 13-2009(A)(2), 13-2001, 13-701, 13-702, and 13-801.

COUNT 11

INSURANCE FRAUD

On or about May 23, 2013, Defendant **GABRIEL CHRISTOPHER MORRIS (001)** knowingly presented, caused to be presented, or prepared with the knowledge or belief that it would be presented an oral or written statement, including computer-generated documents, to GEICO that contained untrue statements of material fact or that failed to state any material fact with respect to an application for the issuance or renewal of an insurance policy in violation of A.R.S. §§ 20-463(A)(1)(a), 20-466.01, 20-466.02, 13-701, 13-702, and 13-801.

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COUNT 12

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THEFT

On or about August 7, 2013 Defendant **GABRIEL CHRISTOPHER MORRIS** (001) without lawful authority, knowingly controlled the property of Helen Marie White, knowing or having reason to know that the property, to wit, U.S. Savings Bonds, with a value of more than four thousand dollars (\$4,000) but less than twenty-five thousand dollars (\$25,000) was stolen, in violation of A.R.S. §§ 13-1802(A)(5), 13-1801, 13-701, 13-702, and 13-801.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in PIMA County, Arizona.

A True Bill
(A "True Bill")

THOMAS C. HORNE
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 8/19/13

[Signature]
BEVERLY RUDNICK
Assistant Attorney General
#3511275

[Signature]
Foreperson of the State Grand Jury